

EXHIBIT 6

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED)
4 STATES VIRGIN ISLANDS)

5 Plaintiff,)

6 vs.)

7 JPMORGAN CHASE BANK, N.A.,)

8 Defendant/Third-)
9 Party Plaintiff.)

10 JPMORGAN CHASE BANK, N.A.)

11 Third-Party)
12 Plaintiff,)

13 vs.)

14 JAMES EDWARD STALEY,)

15 Third-Party)
16 Defendant.)

17 FRIDAY, MAY 26, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 [REDACTED]

20 - - -

21 Videotaped deposition of James
22 Dimon, held at the offices of JPMorgan Chase,
23 383 Madison Avenue, New York, New York,
24 commencing at 9:02 a.m. Eastern, on the above
25 date, before Carrie A. Campbell, Registered
Diplomate Reporter and Certified Realtime
Reporter.

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1 regulations have changed, requirements
2 have changed.

3 QUESTIONS BY MR. BOIES:

4 Q. Who were the experts at the
5 time that you're referring to?

6 A. Steve Cutler would be the
7 primary one that I would refer to, and he had
8 a whole team of people, some of whom had been
9 for -- in the prosecutor's and the Department
10 of Justice. He had been the SEC enforcement
11 chief, and very many capable people in
12 compliance and experts in AML sanctions, et
13 cetera.

14 Q. Is it fair to say that you
15 believe the bank should have done what
16 Mr. Cutler concluded was the appropriate
17 thing to do?

18 MR. BUTTS: Objection. Same
19 instruction.

20 You may answer.

21 THE WITNESS: Cutler was the
22 ultimate authority. It didn't mean
23 that because he didn't like something
24 he wouldn't allow a businessperson to
25 make a different judgment call.

1 If he had felt that it had gone
2 over the line, he would have kicked it
3 out, and he had the authority to do
4 it.

5 So, yes.

6 QUESTIONS BY MR. BOIES:

7 Q. Well, I'm not sure I understand
8 that answer.

9 You said that the experts were
10 the people in charge when Jeffrey Epstein was
11 a customer of the bank.

12 Correct?

13 A. Yes.

14 Q. And I asked you who those
15 experts were, and you said Mr. Cutler.

16 Correct?

17 A. A team of experts.

18 Q. What?

19 A. A team of experts. I said
20 compliance, legal, AML, people who would have
21 been in enforcement, people who would have
22 been out of the DOJ prosecution. He was the
23 most senior of them --

24 Q. Okay.

25 MR. BUTTS: Let him finish.

1 A. He had the right to do the
2 second, and he had the right to do the first.

3 Q. Okay. So there is --

4 MR. BUTTS: David, please let
5 him finish.

6 THE WITNESS: In his judgment,
7 he would make that decision.

8 QUESTIONS BY MR. BOIES:

9 Q. Okay. So he could --

10 MR. BUTTS: Are you finished?

11 THE WITNESS: Yes.

12 MR. BUTTS: Okay. Now your
13 turn.

14 QUESTIONS BY MR. BOIES:

15 Q. So he could decide to let the
16 businessperson make the call not to terminate
17 Mr. Epstein, even though he believed that
18 Mr. Epstein should be terminated; is that
19 fair?

20 MR. BUTTS: Objection. Asked
21 and answered.

22 THE WITNESS: I think it was
23 quite clear because you're kind of
24 changing my meaning.

25 If he thought it rose to the

1 level -- an excess level, he would
2 have said, you can't.

3 If he didn't, sometimes he
4 said, my advice is you shouldn't do
5 it, but it's your call.

6 QUESTIONS BY MR. BOIES:

7 Q. And what this excess level is
8 that you refer to is not anything that's
9 written down; that's just a question of
10 judgment, right?

11 A. There's a group of people who
12 review these things, and they all -- I think
13 they all know at the end of the day that if
14 there's a dispute, he is the final arbiter.

15 Q. Didn't you just tell me that he
16 might think somebody ought to be terminated,
17 but he had the right to say to the
18 businessperson, it's your call, if you don't
19 want to terminate him, let him continue to be
20 a customer?

21 MR. BUTTS: Objection. Asked
22 and answered.

23 THE WITNESS: It's the weight
24 of the scale. People disagree, and he
25 doesn't think it hit the level where

1 A. You've got to read the stuff
2 that's come out. That's --

3 MR. BUTTS: Yeah, I think you
4 have the record. He's not here to
5 translate what he's learned from us.

6 MR. BOIES: Well --

7 THE WITNESS: Maybe he doesn't
8 know.

9 MR. BUTTS: Yeah. I -- either
10 you or your team has the same
11 discovery we have.

12 MR. BOIES: Well, but he's --

13 THE WITNESS: There are
14 terrible -- there are terrible --

15 MR. BOIES: He's the chief
16 executive, and I'm not.

17 THE WITNESS: There are
18 terrible allegations, which, if true,
19 meant that he knew a lot of things
20 sometime during that period that we
21 didn't. And I would include in that
22 Steve Cutler and Mary Erdoes.

23 QUESTIONS BY MR. BOIES:

24 Q. But what I'm trying to get at
25 is, what are those serious allegations?

1 it was in January of 2013 that JPMorgan
2 entered into a cease and desist consent order
3 with the Office of the Comptroller of
4 Currency?

5 A. I don't recall the date, but,
6 yes, I do remember the consent order, yeah.

7 Q. And does that refresh your
8 recollection in any way as to whether this
9 report to you may have been related to that
10 consent cease and desist order?

11 MR. BUTTS: Objection to form.
12 You may answer.

13 THE WITNESS: I don't remember,
14 but it may have been what prompted me
15 to ask.

16 QUESTIONS BY MS. SINGER:

17 Q. Okay. We can put that document
18 aside.

19 All right. Were you aware,
20 Mr. Dimon, of efforts at JPMorgan to launch a
21 donor-advised fund with Bill Gates and The
22 Gates Foundation?

23 A. Only as a result of this --
24 these lawsuits.

25 Q. Okay. So at no time --

1 A. Or what came out with Epstein
2 before.

3 Q. So prior to 2015, were you
4 aware of efforts at JPMorgan to launch a
5 donor-advised fund with Bill Gates through
6 The Gates Foundation?

7 A. I don't -- I was not, no.

8 Q. Okay. So I take it you also
9 were not aware that Jeffrey Epstein played a
10 role in those discussions?

11 MR. BUTTS: Objection.

12 You may answer.

13 THE WITNESS: Oh, absolutely I
14 was not aware. Nor do we need Jeff
15 Epstein to talk to Bill Gates.

16 QUESTIONS BY MS. SINGER:

17 Q. Were you aware that Mary Erdoes
18 and Jes Staley had regular communications
19 with Jeffrey Epstein about that donor-advised
20 fund?

21 A. I am now.

22 MR. BUTTS: Objection.

23 QUESTIONS BY MS. SINGER:

24 Q. And were you aware that the
25 hope was that donor-advised fund would reach